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Michael Grunfeld
Partner

VIA CM-ECF

July 3, 2023

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: *Altimeo Asset Management v. Qihoo 360 Technology Co. Ltd., et al.*,
No. 1:19-cv-10067-PAE (S.D.N.Y.)

Dear Judge Engelmayer:

We write on behalf of Lead Plaintiffs Altimeo Asset Management and ODS Capital LLC (collectively, "Plaintiffs"), pursuant to Rules 1.A and 1.E of the Court's Individual Rules and Practices in Civil Cases, to request an adjournment of the case management conference currently scheduled for July 6, 2023, as scheduled in the Court's Opinion & Order dated June 29, 2023 (ECF No. 164). Defendants Qihoo 360 Technology Co. Ltd. ("Qihoo"), Eric X. Chen, and Hongyi Zhou have consented to this request.

I will be out of the country on July 6, 2023, as I am traveling internationally the entire week on a family vacation. Plaintiffs therefore respectfully request a brief adjournment of the conference. I have consulted with all other counsel, who are available on July 12, 2023 after 1 p.m., July 13, 2023 after 1 p.m., or any time on July 19, 2023, should any of those dates be convenient for the Court. The parties also propose that the (1) joint letter outlining a proposed agenda for the conference, (2) the joint proposed case management plan for discovery, and (3) the proposed briefing schedule for class certification, which the Court directed in its June 29 Opinion & Order, be due at noon the day before the case management conference, or any time after July 11, 2023, to allow the parties sufficient time to confer on the contents of these documents.

None of the parties has previously requested an adjournment of this case management conference. Various parties have requested adjournments of several prior events, including Plaintiffs and Defendants Qihoo and Chen requesting adjournments of certain deadlines related to discovery and class certification, which the Court granted as part of its decision to stay all deadlines pending resolution of Mr. Zhou's motion to dismiss (ECF Nos. 126-27); Mr. Zhou requesting the adjournment of a case management conference that was scheduled for April 5, 2023 and an extension of time to answer the First Amended Complaint, which the Court granted (ECF No.

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148); and Plaintiffs' request for an extension of three business days to file the proposed Second Amended Complaint, which the Court granted (ECF No. 155).

We appreciate the Court's attention to this matter.

Respectfully submitted,

/s/ Michael Grunfeld

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***Lead Counsel for Co-Lead Plaintiffs Altimeo
Asset Management and ODS Capital LLC***

***Additional Counsel for Co-Lead Plaintiff
ODS Capital LLC***

The Court adjourns the conference to July 19, 2023 at 9:30 a.m. This conference will be held telephonically. The parties should call into the Court's dedicated conference line at (888) 363-4749, and enter Access Code 468-4906, followed by the pound (#) key. Counsel are directed to review the Court's Emergency Individual Rules and Practices in Light of COVID-19, found at <https://nysd.uscourts.gov/hon-paul-engelmayer>, for the Court's procedures for telephonic conferences and for instructions for communicating with chambers. Counsel are directed to email to EngelmayerNYSDCChambers@nysd.uscourts.gov, no later than twenty-four hours before the conference, the names of any counsel who wish to enter an appearance at the conference, and the number from which each counsel will be calling. Lead counsel should be denoted with an asterisk.

The joint materials outlined in the June 29, 2023 order at docket 164 are due July 14, 2023.

SO ORDERED.



PAUL A. ENGELMAYER

United States District Judge

July 5, 2023

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